

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
OMAR SALEM,

Plaintiff,

-against-

J.B. HUNT TRANSPORT, INC and JEFFREY ROGERS,

Defendants.
-----X

Docket No.: 1:22-cv-03837

NOTICE OF REMOVAL

Removed from the
Supreme Court, Kings
County Index No.: 501991/2022

The defendants, **J.B. HUNT TRANSPORT, INC. s/h/a J.B. HUNT TRANSPORT, INC AND JEFFREY ROGERS**, remove this action from the Supreme Court, Kings County to the United States District Court for the Eastern District of New York.

1. The plaintiff commenced this action against, **J.B. HUNT TRANSPORT, INC. s/h/a J.B. HUNT TRANSPORT, INC AND JEFFREY ROGERS** in the Supreme Court of the State of New York, Kings County. A copy of the complaint is attached as **Exhibit “A”**.

2. The plaintiff, Omar Salem, resides at 7217 3rd Avenue, Apartment 3L, Brooklyn, New York 11209, he is a citizen of the State of New York and was a citizen of the State of New York when this action was started in state court. Omar Salem is a resident of the County of Kings.

3. J.B. Hunt Transport, Inc. is (and was) a corporation incorporated in the State of Georgia with its principal place of business at 615 J.B. Hunt Corporate Drive, Lowell, Arkansas 72745.

4. Jeffrey Rogers, upon information and belief, resides at 1235 Russell Avenue, Fountain Hill, Pennsylvania 18015 when this action was started in state court. Jeffrey Rogers is a resident of Lehigh County.

5. Defendant J.B. Hunt Transport, Inc. was served on or about January 20, 2022. Defendants answered on May 17, 2022 in Kings County Supreme Court. **Exhibit “B”**.

6. This court has subject-matter jurisdiction over this action under section 1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1), because this action—both now and when it was started—is between citizens of different states and the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs. We were notified by the plaintiff’s attorney and he made a settlement demand of \$150,000 on June 3, 2022 based on alleged head injuries, claims of post-concussion syndrome, C5-6 nerve root impingement and annular tear, right knee medial meniscus tear.

7. The defendants may, under section 1441(a) of the Judicial Code, 28 U.S.C. § 1441(a), remove this action to this court because this is a civil action of which the District Courts of the United States have original jurisdiction that is brought in a state court.

8. All defendants join in the removal of this action to this Court.

Dated: New York, New York
June 30, 2022

RAWLE & HENDERSON LLP
Attorneys for Defendants
J.B. HUNT TRANSPORT, INC.
s/h/a J.B. HUNT TRANSPORT, INC
and JEFFREY ROGERS



By: _____

Anthony D. Luis, Esq.
RAWLE & HENDERSON LLP
14 Wall Street – 27th Floor
New York, New York 10005-2101
Telephone No.: 1 (212) 323-7070
Fax No.: 1 (212) 323-7099
Our File No.: 805755

TO: Timothy R. Mandronico, Esq.
KHAVISON & ASSOCIATES, P.C.
45 Broadway, Suite 720
New York, New York 10006
Attorneys for Plaintiff
OMAR SALEM
E-Mail: tm@khavinson.com
Telephone No.: 1 (212) 785-5000
Fax No.: 1 (347) 983-6992
<http://khavinsonlawfirm.com/>
Your File No.: E-07085